

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

SANDRA FAY GIPSON, as Administratrix,
and Personal Representative on Behalf of
the Wrongful Death Beneficiaries of the
Estate of CHARLES ELLIOTT McGREW,
Deceased
PLAINTIFF

VS. Civil Action No. 3:16-cv-624-DPJ-FKB

MANAGEMENT & TRAINING
CORPORATION and JOHN and JANE
Does 1-100
DEFENDANTS

TELEPHONIC DEPOSITION OF MATTHEW NAIDOW

Taken at the instance of the Defendants
at the law offices of Adams & Reese, LLP,
1018 Highland Colony Parkway, Suite 800
Ridgeland, Mississippi, on
August 4, 2017,
beginning at approximately 10:03 a.m.

(Appearances noted herein.)

REPORTED BY:

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1 transferred -- you want all the facilities I
2 transferred to? I mean, I've -- I transferred
3 multiple times.

4 Q. Yeah. I mean, just as much as -- I
5 want to make sure that -- yeah, just -- just
6 if -- if I need to interrupt you, just -- I
7 will, but just as much as you can give us.

8 A. Sure. So I transferred -- I opened a
9 lot of prisons. I started in Jackson, Central
10 Complex. I transferred across the street to a
11 place called Jackson Temporary Facility and --
12 and built a new prison next door to that called
13 Jackson Cotton Facility, and I opened that. I
14 was a sergeant part of the time there, and then
15 I transferred across the state to Lapeer,
16 Michigan, which was Thumb Correctional Facility,
17 as a sergeant where I stayed for approximately
18 two-and-a-half years there.

19 Then I transferred -- these were all
20 new prisons we were opening, so I had a lot of
21 experience opening prisons. So then I went --
22 transferred back to the Detroit area. There
23 were two prisons built there. I was at the Ryan
24 Correctional Facility as a sergeant for about
25 two-and-a-half more years, then was promoted

1 WITNESS SIGNATURE SHEET

2 I, MATTHEW NAIDOW, do solemnly swear
3 that I have read the foregoing ____ pages and
4 that the same is a true and correct transcript
5 of the testimony given by me at the time and
6 place hereinbefore set forth, with the following
7 corrections:

8 _____
9 MATTHEW NAIDOW
10 PAGE: LINE: SHOULD READ: REASON FOR CHANGE:
11 _____
12 _____
13 _____
14 _____
15 _____

16 STATE OF MISSISSIPPI
17 COUNTY OF _____
18

19 SUBSCRIBED AND SWORN TO BEFORE ME, the
20 undersigned authority, on this the ____ day
21 _____, 2017.

22 _____
23 NOTARY PUBLIC

24 My Commission Expires:
25 _____